

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

DAVID DIXON, et al.,	)	
	)	
Plaintiffs,	)	Case No. 4:19-CV-00112-AGF
	)	
v.	)	
	)	
CITY OF ST. LOUIS, et al.,	)	
	)	
Defendants.	)	

MOTION FOR JUDGMENT ON THE PLEADINGS

Defendants City of St. Louis, Vernon Betts, and Dale Glass move the Court for judgment on the pleadings, pursuant to F.R.Civ.P. 12(c), on the grounds that (1) this action is moot; (2) this Court lacks equitable jurisdiction under 42 U.S.C. §1983, over the claims against these defendants insofar as plaintiffs seek to enjoin continued custody of any class plaintiff; (3) this Court should abstain from intervening in ongoing state criminal prosecutions to define the duties of court officers before and during state court proceedings; and (4) plaintiffs lack standing to seek relief against defendant Sheriff Betts.

A memorandum in support of this motion is filed concurrently herewith.

WHEREFORE these defendants pray that judgment be entered in their favor herein, dismissing all claims against them.

Respectfully submitted,  
JULIAN L. BUSH  
CITY COUNSELOR

/s/ Robert H. Dierker  
Robert H. Dierker 23671MO  
Associate City Counselor  
dierkerr@stlouis-mo.gov

Meghan Bruyns 69987MO  
Assistant City Counselor  
1200 Market St.  
City Hall, Rm 314  
St. Louis, MO 63103  
314-622-3361  
Fax 314-622-4956